

Theodore W. Chandler (Bar No. 219456)
<ted.chandler@bakerbotts.com>

BAKER BOTTS L.L.P.
1801 Century Park East, Suite 2400
Los Angeles, California 90067
Telephone: (213) 202-5702
Facsimile: (213) 202-5732

Cheryl A. Cauley (Bar No. 252262)
<cheryl.cauley@bakerbotts.com>

BAKER BOTTS L.L.P.
1001 Page Mill Road
Building One, Suite 200
Palo Alto, CA 94304-1007
Telephone: (650) 739-7500
Facsimile: (650) 739-7699

Attorneys for Defendants/Counterclaimant

**UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA**

TOTAL VISION, LLC et al.,

Plaintiffs,

v.

VISION SERVICE PLAN a/k/a VSP
GLOBAL et al.,

Defendants.

CASE NO. 8:23-cv-01805-WLH
(DFMx)

**JOINT STIPULATION OF
VOLUNTARY DISMISSAL WITH
PREJUDICE**

Judge: The Honorable Wesley L. Hsu

Trial Date: December 1, 2025

1 **JOINT STIPULATION OF VOLUNTARY DISMISSAL WITH PREJUDICE**

2 WHEREAS, on May 7, 2025, the parties conducted a mediation and reached
3 an agreement in principle that would resolve this case;

4 WHEREAS, on May 13, 2025, the parties stipulated to a stay of this litigation
5 pending the parties' negotiation and execution of a final written settlement agreement
6 (Dkt. 142);

7 WHEREAS, on May 21, 2025, the Court entered an Order adopting the parties;
8 stipulation to stay this litigation (Dkt. 143); and

9 WHEREAS, on June 13, 2025, the parties executed a confidential, written
10 settlement agreement resolving this case in its entirety.

11 ACCORDINGLY, pursuant to Fed. R. Civ. P. 41(a)(2), the parties mutually
12 agree and stipulate to voluntarily dismiss Plaintiffs Total Vision, LLC and Total
13 Vision, P.C.'s claims asserted in the Complaint (Dkt. 1) with prejudice and without
14 costs, fees, or expenses to any party. The parties further mutually agree and stipulate
15 to voluntarily dismiss Defendant and Counterclaimant Vision Service Plan a/k/a VSP
16 Global's counterclaims asserted in Defendants' Answer to Plaintiffs' Complaint and
17 Affirmative Defenses and VSP's Counterclaims (Dkt. 42) with prejudice and without
18 costs, fees, or expenses to any party.

19 The parties hereby request that the Court enter an Order consistent with the
20 parties' joint stipulation of voluntary dismissal with prejudice.
21
22
23
24
25
26
27
28

1 IT IS SO STIPULATED, THROUGH COUNSEL OF RECORD.

2 DATED: August 11, 2025

QUINN EMANUEL URQUHART &
SULLIVAN, LLP

3
4
5 By /s/ William R. Sears

6 Adam B. Wolfson

7 William R. Sears

Kathryn D. Hutchins

8 Maxwell P. Deabler-Meadows

9 Lynette Lim

10 *Attorneys for Plaintiffs Total Vision, LLC*
11 *and Total Vision, P.C.*

12 DATED: August 11, 2025

REINHART BOERNER VAN DEUREN s.c.
and BAKER BOTTS L.L.P.

14
15 By /s/ James N. Law

16 Laura A. Brenner

17 Scott W. Hansen

18 Jessica H. Polakowski

19 Olivia J. Brooks

James N. Law

20 Theodore W. Chandler

21 Cheryl A. Cauley

22 James G. Kress

Paul C. Cuomo

23 *Attorneys for Defendants Vision Service*
24 *Plan, A/K/A VSP Global, VSP Ventures*
25 *Management Services, LLC, Altair*
26 *Eyewear, Inc., Eyefinity, Inc., Marchon*
27 *Eyewear, Inc., and VSP Labs, Inc.*
28

1 Pursuant to Local Rule 5-4.3.4(a)(2)(i), the filing party hereby attests that all
2 signatories listed, and on whose behalf the filing is submitted, concur in this filing's
3 content and have authorized this filing.
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28